

COMMENTS
RIVER MILE 10.9 REMOVAL ACTION DESIGN WORK PLAN
LOWER PASSAIC RIVER STUDY AREA
DATED AUGUST 2, 2012

<u>No.</u>	<u>General Comments</u>
1	Overall, the RDWP closely follows the provisions of the AOC and the SOW. As this will be a final work plan, please incorporate the changes requested below and re-submit the document for approval.

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
2	Page 1-2, Section 1.2.2, Paragraph 2	The removal area is listed here as approximately 5.6 acres, whereas it is listed as 5 acres in the AOC. For clarity, please add a brief explanation or footnote of why the area increased.
3	Page 1-2, Section 1.2.3	Please add a brief description of Passaic River hydrology and of the NJDEP designated use classification, and the associated designated uses, in the area of the removal.
4	Page 1-2, Section 1.2.3	Please remove the first sentence of the last paragraph of this section ("The surface sediment of the RM 10.9 Removal Area is believed to be....").
5	Page 1-3, First Sentence	The AOC does not require removal of debris and sediment via water, nor does it require the use of mechanical dredging. Please clarify that the CPG proposes using on-river transport, doing the work on-water, and using mechanical dredging, and that the rationale for taking this approach will be expanded upon in the design. In other words, the option of doing the work on-land can't be dismissed without any consideration of the option. EPA is not suggesting that it disagrees with the CPG's approach.
6	Page 1-3, 3 rd Paragraph	Please delete the first few words of this paragraph, and begin with "To investigate alternate dispositions...."
7	Page 1-3, 5 th Paragraph	Please re-write the first two sentences of this paragraph as follows: Following completion of the sediment removal, a protective cap will be constructed, monitored and maintained over the Removal Area. Data gathered during the monitoring of the performance of this cap will be evaluated and taken into consideration in the LPRSA RI/FS and may help inform the remedy selection process for future response actions.
8	Page 1-4, Section 1.5, Bullet 2	a. Add the word "approximately" before each instance of the 18,000 CY figure. b. Add language at the end of this bullet indicating that the ex situ volume to be treated depends upon what the treatment vendor(s) can address.

<u>No.</u>	<u>Worksheet No./</u> <u>Page No.</u>	<u>Specific Comments</u>
9	Page 2-1, Section 2.1	In the last sentence of the first paragraph, "addition" should be "additional."
10	Page 3-2, Section 3.1.1.3	Neither this section, nor Section 3.1.2.2, mention dewatering of the sediment once it is off-loaded from the barge. If pilot studies are not conducted, will dewatering be required prior to stabilization? If so, this step needs to be incorporated into the design.
11	Page 3-6, Section 3.1.3	The text notes that the final design will include all comments that are "mutually resolved" between EPA and the CPG. As is stated in the SOW, the final design shall "fully incorporate EPA comments." Please revise.
12	Page 5-1, Table 5-1, Design Approach	Three of the five design packages considered are designated as "performance" and two are designated as "prescriptive." Please expand on these designations and their implications with respect to the subsequent design phases and integration with contractor procurement and the overall implementation/construction schedule.